

# **EXHIBIT 1**

**From:** [Houghton-Larsen, M Annie](#)  
**To:** [Crowell, Nicholas P.](#); [Gottlieb, Michael](#); [Governski, Meryl Conant](#)  
**Cc:** [Ransom, Rollin](#); [Horner, James R.](#); [Everson, Katelin](#)  
**Subject:** RE: Drake v. UMG - Rule 11 Letter and Motion  
**Date:** Wednesday, February 19, 2025 3:34:38 PM

---

**EXTERNAL EMAIL - Use caution with links and attachments.**

Counsel,

We are in receipt of your letter and draft motion and have considered UMG's position. Although we respectfully disagree with certain of the assertions you have made in your correspondence, Plaintiff nonetheless agrees to withdraw the allegation you have identified and correct it. We appreciate your conferral on this issue, and trust that this moots the relief sought by your letter and draft motion.

Thank you,

**M.Annie Houghton-Larsen**  
**Willkie Farr & Gallagher LLP**  
787 Seventh Avenue | New York, NY 10019-6099  
Direct: [+1 212 728 8164](tel:+12127288164) | Fax: +1 212 728 9164  
[mhoughton-larsen@willkie.com](mailto:mhoughton-larsen@willkie.com) | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)  
Pronouns: she, her, hers

---

**From:** Crowell, Nicholas P. <[ncrowell@sidley.com](mailto:ncrowell@sidley.com)>  
**Sent:** Thursday, February 13, 2025 8:32 PM  
**To:** Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>  
**Cc:** Ransom, Rollin <[rransom@sidley.com](mailto:rransom@sidley.com)>; Horner, James R. <[jhorner@sidley.com](mailto:jhorner@sidley.com)>; Everson, Katelin <[keverson@sidley.com](mailto:keverson@sidley.com)>  
**Subject:** Drake v. UMG - Rule 11 Letter and Motion

**\*\*\* EXTERNAL EMAIL \*\*\***

Counsel,

Please see the attached correspondence and motion.

Kind regards,

**NICHOLAS P. CROWELL**

**SIDLEY AUSTIN LLP**

+1 212 839 5449

[ncrowell@sidley.com](mailto:ncrowell@sidley.com)

\*\*\*\*\*

This e-mail is sent by a law firm and may contain information that is privileged or confidential.  
If you are not the intended recipient, please delete the e-mail and any attachments and notify us  
immediately.

\*\*\*\*\*

---

**Important Notice:** This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.